

1 Vanessa R. Waldref
2 United States Attorney
3 Eastern District of Washington
4 Todd M. Swensen
5 Assistant United States Attorney
6 402 E. Yakima Ave., Suite 210
7 Yakima, WA 98901
8 Telephone: (509) 454-4425

FILED IN THE U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

JAN 11 2022

SEAN F. MCAVOY, CLERK
DEPUTY
YAKIMA, WASHINGTON

9 UNITED STATES DISTRICT COURT
10 FOR THE EASTERN DISTRICT OF WASHINGTON

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 ZEBULION IAN LISTER and
15 MIRANDA LOUISE WAHL,

16 Defendants.

1:22-CR-2006-SMJ
INDICTMENT

Vio: 18 U.S.C. §§ 922(a)(6),
924(a)(2)
False Statement During Purchase
of a Firearm
(Count 1)

18 U.S.C. §§ 922(g)(1),
924(a)(2)
Felon in Possession of a
Firearm

18 U.S.C. § 924(d),
28 U.S.C. § 2461(c)
Forfeiture Allegations

22 The Grand Jury charges:

23 COUNT 1

24 On or about August 1, 2021, in the Eastern District of Washington, the
25 Defendant, MIRANDA LOUISE WAHL, in connection with the acquisition of a
26 firearm, to wit: a Taurus Armas PT111 G2 A pistol, bearing serial number
27 ACA447674, from Cabela's, a licensed dealer of firearms within the meaning of
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INDICTMENT - 1

1 Chapter 44, Title 18, United States Code, knowingly made a false and fictitious
2 written statement to Cabela's, which statement was intended and likely to deceive
3 Cabela's as to a material fact to the lawfulness of such sale of the said firearm to
4 the Defendant under Chapter 44 of Title 18, in that the Defendant did represent on
5 a Department of Justice, Alcohol, Tobacco, Firearms and Explosives (ATF) Form
6 4473, Section 21.a., that the Defendant was the actual buyer of said firearm and not
7 acquiring said firearm on behalf of another person, in violation of 18 U.S.C.
8 §§ 922(a)(6), 924(a)(2).

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COUNT 2

On or about August 9, 2021, in the Eastern District of Washington, the
Defendant, ZEBULION IAN LISTER, knowing of his status as a person
previously convicted of a crime punishable by imprisonment for a term exceeding
one year, did knowingly possess in and affecting commerce a firearm, to wit: a
Taurus Armas PT111 G2 A pistol, bearing serial number ACA447674, which
firearm had theretofore been transported in interstate and/or foreign commerce, in
violation of 18 U.S.C. §§ 922(g)(1), 924(a)(2).

NOTICE OF CRIMINAL FORFEITURE

The allegations contained in this Indictment are hereby realleged and
incorporated by reference for the purpose of alleging forfeitures.

Pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), upon conviction
of an offense in violation of 18 U.S.C. §§ 922(a)(6), 924(a)(2), as set for in Count
1 of this Indictment, or in violation of 18 U.S.C. §§ 922(g)(1), 924(a)(2), as set
forth in Count 2 of this Indictment, Defendants, MIRANDA LOUISE WAHL
(Count 1), and ZEBULION IAN LISTER (Count 2), shall forfeit to the United
States of America, any firearm involved or used in the commission of the offense.

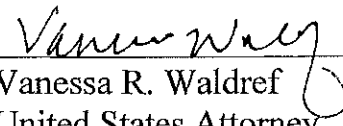
1 If any forfeitable property, as a result of any act or omission of the
2 Defendants:

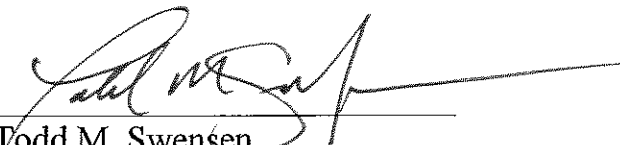
- 3 (a) cannot be located upon the exercise of due diligence;
4 (b) has been transferred or sold to, or deposited with, a third party;
5 (c) has been placed beyond the jurisdiction of the court;
6 (d) has been substantially diminished in value; or
7 (e) has been commingled with other property which cannot be divided
8 without difficulty;

9 the United States of America shall be entitled to forfeiture of substitute property
10 pursuant to 21 U.S.C. § 853(p).

11 DATED this 11th day of January 2022

12
13 A TRUE BILL

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17 Vanessa R. Waldref
18 United States Attorney

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20 Todd M. Swensen
21 Assistant United States Attorney
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